

**RESPONSE TO ACCOMPANY REQUEST FOR CONTINUED EXAMINATION****PAGE 7**

Serial No. 09/989,967

Attorney Docket No. 10008078-1

Title: IMAGING DEVICE LIST STORAGE

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**REMARKS****Claim Amendments**

Claims 1, 8-10 and 13-16 are amended herein and claims 21 and 22 are added hereby. Applicant contends the amendments are supported by the Specification as filed and thus do not constitute new matter. Claims 2 and 7 are canceled hereby in view of amendments to claim 1.

**Claim Rejections Under 35 U.S.C. § 103**

Claims 1-11 and 13-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Danknick (U.S. Patent No. 6,021,429) in view of the HTTP 1.0 Specification (Request for Comments: 1945, Berners-Lee et al., May 1996). Claims 2 and 7 are canceled hereby without prejudice or disclaimer. Applicant traverses as to remaining claims 1, 3-6, 8-11 and 13-20.

Claim 1 is amended to recite, in part, "a controller coupled to the network interface and the image generator, wherein the controller is internal to the first imaging device and is adapted to store a list of other imaging device network addresses" and "wherein the controller is further adapted to discover the list of other imaging device network addresses and to limit the list of other imaging device network addresses to those other imaging devices that are similar to the imaging device." Applicant contends this amendment is supported by the Specification as filed. *See, e.g.*, Specification, paragraph 0013 ("determining a list of network addresses for other imaging devices similar to an imaging device") and paragraph 0022 ("preferential that the stored list of imaging devices are similar to each other and to the imaging device that stores the list").

Applicant has noted that management facilities have limited scope. *See*, Specification, paragraph 0003 ("These management facilities are typically specific to the device, class of device, or even device manufacturer, that is being managed or communicated with."). Thus, Applicant has provided a solution to address a list of network devices that is limited to those devices that are similar to each other. The cited references, taken either alone or in combination, fail to teach or suggest at least this limitation of claim 1. In particular, the HTTP 1.0 Specification does not purport to discover network addresses, and Danknick purports to seek identification and listing of every network device it discovers. *See, e.g.*, Danknick, column 7, lines 57-59 ("Regarding the list of device addresses, a list manager on LAN 1 (which may or

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may not be NEB 2) maintains a list of device addresses from other devices on LAN 1.”) and column 10, lines 15-19 (“If, on the other hand, NEB 2 receives the device address of the other network device, processing proceeds to step S511 in which NEB 2 adds the device address of that other network device to the list of device addresses in NEB 2.”). While Applicant acknowledges that the list of Danknick may include similar devices, Danknick does not purport to limit its list. Because Danknick provides no decision process for adding a network address to its list other than it receives the network address of a device on its network that it does not already have, and the HTTP 1.0 Specification provides no decision process for adding a network address to a list, Applicant contends that the cited references, taken either alone or in combination cannot teach or suggest limiting a list of network addresses to those device similar to the device performing the discovery. Applicant further contends that Danknick expressly teaches away from such a limitation. Accordingly, Applicant contends that claim 1 is patentably distinct from the cited references.

Claim 13 is amended to recite, in part, “determining a list of network addresses limited to other imaging devices similar to a first imaging device.” As noted with respect to claim 1, Applicant contends that the cited references, taken either alone or in combination, fail to teach or suggest at least this limitation of claim 13. Applicant further contends that the primary reference of Danknick expressly teaches away from this limitation of claim 13. Accordingly, Applicant contends that claim 13 is patentably distinct from the cited references.

Claim 15 is amended to recite, in part, “determining a list of network addresses and supplemental information limited to other imaging devices similar to a first imaging device.” As noted with respect to claim 1, Applicant contends that the cited references, taken either alone or in combination, fail to teach or suggest at least this limitation of claim 15. Applicant further contends that the primary reference of Danknick expressly teaches away from this limitation of claim 15. Accordingly, Applicant contends that claim 15 is patentably distinct from the cited references.

As claims 3-6 and 8-11 include all patentable limitations of claim 1, claim 14 includes all patentable limitations of claim 13 and claims 16-20 include all patentable limitations of claim 15, these claims are also believed to be allowable. Applicant thus respectfully requests reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a), and allowance of claims 1, 3-6, 8-11 and 13-20.

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*New Claims*

Claims 21 and 22 include all patentable limitations of claim 1. As Applicant contends it has shown claim 1 to be patentably distinct from the cited references, Applicant contends that the new claims must also be patentably distinct from the cited references. Applicant thus respectfully requests entry and allowance of claims 21 and 22.

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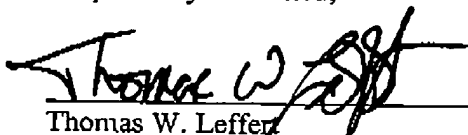
**CONCLUSION**

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 08-2025.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2204.

Respectfully submitted,

Date:

18 DEC 07

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